UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE FOREIGN EXCHANGE BENCHMARK
RATES ANTITRUST LITIGATION

No. 1:13-cv-07789-LGS

[PROPOSED] ORDER GRANTING MOTION FOR ISSUANCE OF A
HAGUE CONVENTION REQUEST FOR INTERNATIONAL
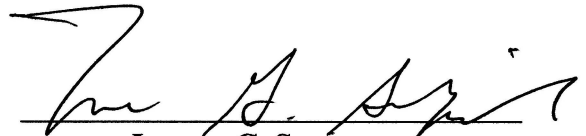### JUDICIAL ASSISTANCE TO TAKE TESTIMONY OVERSEAS

The Court, having reviewed Plaintiffs' Motion for Issuance of a Hague Convention Request

for International Judicial Assistance to Take Testimony Overseas as well as the papers in support

and opposition, HEREBY ORDERS THAT:

1.   The Motion is GRANTED.

2.   The Request for International Judicial Assistance Pursuant to the Hague Convention

of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters attached as

Exhibit A to the Declaration of Christopher M. Burke, dated February 20, 2020 is hereby issued as

the Court's "Letter of Request" and is fully incorporated herein.

3.   The signed Order and the Letter of Request will be given to Scott+Scott Attorneys at

Law LLP, Interim Co-Lead Counsel for Plaintiffs, who will cause both documents to be filed with

The Senior Master (Queen's Bench Division), Royal Courts of Justice, Strand, London WC2A 2LL,

England.

3.   The Stipulation and Order of Confidentiality (ECF No. 555) in this action shall apply

to the deposition, including the transcript and video.

4.   This Order, the deposition of Robert ("Bob") De Groot or the terms of the Letter of Request (which are incorporated into this Order) shall not be construed or operate as a waiver of any argument, position, objection, allegation, or claim or defense of any party in the above-captioned action, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions that may apply to that evidence under the laws of the United Kingdom, the United States of America, or the State of New York.

IT IS SO ORDERED.

Dated: March 2, 2020
        New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE